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6 UNITED STATES BANKRUPTCY COURT

7 CENTRAL DISTRICT OF CALIFORNIA

8 LOS ANGELES DIVISION

9 In re:) Case No.: 2:21-bk-17445-WB

10 PARK PLACE MASTER TENANT, LLC) Chapter 7

11) STIPULATION TO AMEND THE
12) BRIEFING SCHEDULE ON MOTION TO
13) APPROVE COMPROMISE OF
14) CONTROVERSY AND TO COMPEL
15) TURNOVER OF POSSESSION OF
16) ITEMS RELATED TO REAL
17) PROPERTY

18) **HEARING DATE:**

19) DATE: December 16, 2021

20) TIME: 2:00 P.M.

21) CTRM: 1375

22 TO THE HONORABLE JULIA W. BRAND, UNITED STATES BANKRUPTCY

23 JUDGE:

24 WHEREAS, Rosendo Gonzalez, Chapter 7 Trustee, has filed the CHAPTER 7
25 TRUSTEE'S MOTION TO APPROVE COMPROMISE OF CONTROVERSY AND TO
26 COMPEL TURNOVER OF POSSESSION OF ITEMS RELATED TO REAL PROPERTY;
27 MEMORANDUM OF POINTS AND AUTHORITIES; AND DECLARATION IN SUPPORT
28 THEREOF Docket # 41, in this Chapter 7 case (the "Motion");

29 WHEREAS, Debtor intends to Oppose the Motion, including the possibility of
30 opposition in the form of a higher competing offer for the assets that are proposed to be sold as a
31 part of the Motion;

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WHEREAS, the matter is set for hearing on the court's 2:00 p.m. calendar on December 16, 2021;

WHEREAS, pursuant to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules, the resulting briefing schedule for the Debtor's opposition to the Motion is December 2, 2021, and the movant's reply would be due December 9, 2021;

WHEREAS, the Debtor's counsel has requested, and the movant's counsel has agreed, that the briefing schedule for the Motion be amended so that the Debtor's opposition to the Motion may be filed on December 6, 2021, and that the movant's reply may be filed by December 13, 2021.

Therefore, IT IS HEREBY STIPULATED AND AGREED, and the parties request that an Order be entered as follows:

1. Debtor's deadline to file written Opposition to the Motion shall be extended to December 6, 2021;

2. Movant's deadline to file written Reply shall be extended to **December 13, 2021**;
3. The parties respectfully request that the Court enter an Order consistent with this stipulation, which Order is lodged separately and concurrently.

IT IS SO STIPULATED.

Dated: December 2, 2021

CURD, GALINDO & SMITH, LLP

By: Jeffrey B. Smith
Attorney for Debtor

Dated: December 2, 2021

LEVENE, NEALE, BENDER, YOO
& GOLUBCHIK, L.L.P.

By: Carmela T. Pagay
Attorney for Rosendo Gonzalez
Chapter 7 Trustee

1	In re: PARK PLACE MASTER TENANT, LLC	Chapter: 7
2	Debtor(s).	Case Number: 2:21-BK-17445-WB

3 NOTE: When using this form to indicate service of a proposed order, **DO NOT** list any person or entity in Category 1.
4 Proposed orders do not generate an NEF because only orders that have been entered are placed on a CM/ECF docket.

5 PROOF OF SERVICE OF DOCUMENT

6 I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

7 301 E. Ocean Blvd., Suite 1700
Long Beach, CA 90802

8 A true and correct copy of the foregoing document described as STIPULATION TO AMEND THE BRIEFING SCHEDULE ON
9 MOTION TO APPROVE COMPROMISE OF CONTROVERSY AND TO COMPEL TURNOVER OF POSSESSION OF
ITEMS RELATED TO REAL PROPERTY will be served or was served (a) on the judge in chambers in the form and manner
required by LBR 5005-2(d), and (b) in the manner indicated below:

10 **I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF")-** Pursuant to controlling
General Order(s) and Local Bankruptcy Rule(s) ("LBR"), the foregoing document will be served by the court via NEF and
hyperlink to the document. On 12/1/2021, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and
determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email addressed
indicated below:

13 Hal D Goldflam hgoldflam@frandzel.com, dmoore@frandzel.com

14 Rosendo Gonzalez (TR) rgonzalez@ecf.axosfs.com,
rossgonzalez@gonzalezplc.com;jzavalal@gonzalezplc.com;zig@gonzalezplc.com

15 Dare Law dare.law@usdoj.gov

16 Jeffrey B Smith jsmith@cgsattys.com, vphillips@cgsattys.com

17 United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov

18 Reed S Waddell rwaddell@frandzel.com, sking@frandzel.com

19 Craig A Welin cwelin@frandzel.com, bwilson@frandzel.com

20 Timothy J Yoo tjiy@lnbyb.com

21 **III. SERVED BY PERSONAL DELIVERY, FACSIMILE TRANSMISSION OR EMAIL** (indicate method for each person
or entity served): Pursuant to F.R.Civ.P. 5 and/or LBR, on _____ I served the following person(s) and/or entity(ies) by personal
delivery, or (for those who consented in writing to such service method) by facsimile transmission and/or email as follows.
22 Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the
document is filed.

24 I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

26 12/2/21
Date

Valerie Phillips
Type Name

27
Signature